

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KAJEET, INC.,

Plaintiff,

v.

MCAFEE CORP.,

Defendant.

C.A. No. 21-cv-00005-MN

JURY TRIAL DEMANDED

**DEFENDANT MCAFEE CORP.’S MOTION TO DISMISS PLAINTIFF KAJEET, INC.’S
FIRST AMENDED COMPLAINT**

Defendant McAfee Corp (“McAfee”) hereby moves this Court to dismiss Plaintiff Kajeet, Inc.’s (“Kajeet”) amended claims for direct, indirect, and willful infringement of U.S. Patent 8,667,559, along with Kajeet’s amended past damages claim, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted.

The basis of this motion is more fully set forth in Defendant’s Opening Brief in Support of Motion to Dismiss, filed herewith. A proposed form of Order is attached.

By: /s/ Susan E. Morrison

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Dated: April 26, 2021